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Mr. Joseph Fredle
United States Environmental Protection Agency
Emergency Response Branch, Region 5
25089 Center Ridge Road
Westlake, Ohio 44145

Subject
Site-Specific Cleanup Levels and Risk Assessment
Trinity Superfund Site
Cleveland, Ohio

Date:
August 29, 2008

Contact
Ron Clark, P.E., C.P.

Phone:
330.697.2244

Email
ron.clark@arcadis-us.com

Our ref:
B0083322

Dear Mr. Fredle:

ARCADIS, on behalf of Standex International Corporation (Standex), is submitting three copies of this application (*Site-Specific Cleanup Levels and Risk Assessment*) for a risk-based polychlorinated biphenyl (PCB) cleanup level at the Trinity Superfund Site located at 9203 Detroit Avenue in Cleveland, Cuyahoga County, Ohio (site). This application is being made pursuant to Section VIII, Paragraph 6), of the Administrative Settlement Agreement and Order on Consent for Removal Action (AOC).

The AOC states that the application is to follow the requirements of 40 Code of Federal Regulations (CFR) 761.61(c). 40 CFR 761.61(c) states that each application is to contain information described in the notification required by 40 CFR 761.61(a)(3). As discussed during our August 27, 2008 site visit, this site is unique in that much of the background information requested by 40 CFR 761.61(a)(3) has been generated by the United States Environmental Protection Agency (USEPA). Other information requirements of 40 CFR 761.61(a)(3) are contained in information already in the USEPA's possession. At your suggestion, the following lists the requirements of 40 CFR 761.61(a)(3) and provides a reference for documents in USEPA files that contain the requested information:

(i) *At least 30 days prior to the date that the cleanup of a site begins, the person in charge of the cleanup or the owner of the property where the PCB remediation waste is located shall notify, in writing, the USEPA Regional Administrator, the Director of the State or Tribal environmental protection agency, and the Director of the county or local environmental protection agency where the cleanup will be conducted. The notice shall include:*

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(A) *The nature of the contamination, including kinds of materials contaminated.*

This information is located in the *Site Assessment Report for the Trinity Site*, Weston Solutions. February 14, 2008. This document was prepared under contract with the USEPA.

(B) *A summary of the procedures used to sample contaminated and adjacent areas and a table or cleanup site map showing PCB concentrations measured in all pre-cleanup characterization samples. The summary must include sample collection and analysis dates. The USEPA Regional Administrator may require more detailed information including, but not limited to, additional characterization sampling or all sample identification numbers from all previous characterization activities at the cleanup site.*

Information on USEPA-contracted sampling is located in the *Site Assessment Report for the Trinity Site*, Weston Solutions, February 14, 2008. Information on Standex sampling is located in the *First Work Plan for Characterization and Off-Site Disposal of South and East Crushed Concrete Piles and West Pad* (FWP) and *Second Work Plan for Characterization and Off-Site Disposal of North Rubble Pile, Southeast Crushed Concrete Pit, Southern Boundary Excavation Area, East and South Pads, and Soil* (SWP), ARCADIS, July 17, 2008 and August 29, 2008, respectively.

(C) *The location and extent of the identified contaminated area, including topographic maps with sample collection sites cross-referenced to the sample identification numbers in the data summary from paragraph (a)(3)(i)(B) of this section.*

Information on the USEPA-contracted sampling is located in the *Site Assessment Report for the Trinity Site*, Weston Solutions, February 14, 2008. In the attached are figures that show sample points of all Standex sampling performed by ARCADIS

(D) *A cleanup plan for the site, including schedule, disposal technology, and approach. This plan should contain options and contingencies to be used if unanticipated higher concentrations or wider distributions of PCB*

*remediation waste are found or other obstacles force changes in the cleanup approach.*

This information is located in the FWP (ARCADIS. July 17. 2008) and SWP (ARCADIS. August 29. 2008).

(E) *A written certification, signed by the owner of the property where the cleanup site is located and the party conducting the cleanup, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file at the location designated in the certificate and are available for USEPA inspection. Persons using alternate methods for chemical extraction and characterization must include in the certificate a statement that such a method will be used, and that a comparison study that meets or exceeds the requirements of Subpart Q of this part, and for which records are on file, has been completed prior to verification sampling.*

This information is addressed in Sections X and XI of the AOC. In addition, as required by Standex's Access Agreement with the City of Cleveland, the property owner, a copy of all reports will be submitted to the city for their files.

Standex's risk-based PCB cleanup level application is based on the findings of the attached *Site-Specific Cleanup Levels and Risk Assessment* prepared by ARCADIS. This assessment concludes that site-specific cleanup levels are for:

- Soils:
  - 140 mg/kg for indoor industrial workers
  - 41 mg/kg for outdoor industrial workers
  - 180 mg/kg for construction workers
- Concrete
  - 160 mg/kg for concrete pads and large- and medium-sized pieces of concrete for on-site outdoor workers.

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- 29 mg/kg for very small particles (approximately 250 µm mean aerodynamic diameter or smaller) that can be inhaled or might be incidentally ingested (inhaled or directly ingested) for on-site outdoor workers.

It was requested that the application for a risk-based cleanup level address any engineering controls or intuitional controls that Standex will be relying on for its remediation of PCBs. At this time, Standex does not anticipate using any engineering controls to achieve compliance. It is anticipated that all materials with a PCB level above the agreed upon cleanup concentrations will be removed from the site and properly disposed off site. The city has indicated that it will be filing an Environmental Covenant for the property restricting future use to non-residential or industrial use. For the risk-based PCB cleanup levels, Standex has relied upon this Environmental Covenant being filed.

To expedite the approval process ARCADIS would request the USEPA continue the practice of e-mailing or calling us with any questions/comments as they are identified. This will allow ARCADIS to address these questions/comments immediately and keep the project on schedule. General questions/comments on the application should be addressed to Ron Clark, 330.697.2244 (cell phone) or ron.clark@arcadis-us.com (e-mail). Questions/comments on the Risk Assessment Report should be addressed to Betty Locey, Ph.D., DABT at 734.994.2263 or betty.locey@arcadis-us.com (email).

Sincerely,

ARCADIS

Ron R. Clark, P.E., C.P.
Principal Engineer

Copies:
Ms. Stacy Constas, Esq., Standex International Corporation
Mr. Frank Deodray, WESTON Solutions
Mr. William Popham, ARCADIS
Mr. Joseph Molina, P.E., ARCADIS
Ms. Betty Locey, Ph.D., DABT
Mr. Thomas Hile, ARCADIS